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Attorneys for Plaintiff,
MAURA RODRIGUEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

MAURA RODRIGUEZ, individually, and on
behalf of all others similarly situated

Plaintiff,

vs.

M2 INGREDIENTS INC., a California
Corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No.: 37-2023-00049140-CU-OE-CTL

*[Assigned for All Purposes to the Hon. Richard
Whitney, Dept. C-68]*

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF PLAINTIFF MAURA
RODRIGUEZ IN SUPPORT OF MOTION
FOR APPROVAL OF CLASS ACTION AND
REPRESENTATIVE ACTION
SETTLEMENT**

Date: November 7, 2025
Time: 10:30 a.m.
Courtroom: C-68
Judge: Hon. Richard Whitney

Action Filed: November 9, 2023
Trial Date: Not Set

DECLARATION OF MAURA RODRIGUEZ

I, MAURA RODRIGUEZ, declare as follows:

1. I am a named Plaintiff in this case. I am a former employee of the named defendant, M2 INGREDIENTS, INC. ("Defendant"). As such, I have personal knowledge of, or am informed and believe, the following facts herein stated. If called as a witness. I could and would testify competently to the following:

JOB DUTIES AND EXPERIENCES

2. I worked for Defendant during the Settlement Class Period. My employment began on about October 31, 2017 and ended on or about September 13, 2022. I held the job position of Packer, one of the positions that is at issue in this case and included within the class.

3. My job duties included the filling of packets and product checks.

4. I experienced delays waiting to clock in, off-the-clock work, sometimes had had meal breaks or had my meal breaks interrupted, sometimes had interrupted or missed rest breaks, and used my cell phone for work purposes without reimbursement. As a result of these issues, I did not receive all wages when due and my wage statements were not always accurate.

DUTIES OF A CLASS REPRESENTATIVE

5. This lawsuit is not an individual lawsuit. It is a proposed class action. I understand that, if approved as a class representative in this matter, I have an obligation to do my best to look out for the interests of other class members, the current and former employees of Defendant who I am seeking to represent. I understand that my obligations to the class exist even when the class is certified solely as part of a class action settlement. It is my understanding that, as one part of this duty to the class, I cannot agree to a settlement to benefit myself to the exclusion of the rest of the class members. I have never asked my attorneys to simply settle this matter at any cost. Rather, I have asked them to obtain the best settlement they could within reason, and I believe that they have attempted to do so.

6. This case was filed more than one year ago. I have never asked to be relieved from my

1 role as a proposed class representative. To the contrary, I have made myself available whenever my
2 attorneys wanted to discuss aspects of my employment by Defendant, and I remain committed to seeing
3 this matter through to the end.

4 7. I have conferred with my attorneys about the settlement proposed in this case. I am not
5 an accountant, but I understand the factors and risks that need to be considered when evaluating a
6 settlement.

7 8. Summing it all up in the simplest terms, I am asking to be stand-in for other
8 employees of Defendant. Because of that, I cannot quit on the Class, and I cannot put myself and my
9 interests before the Class. I accept these duties and request that I be approved as the class
10 representative for purposes of this amended Settlement.

11
12 COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

13 9. I was an hourly non-exempt employee of Defendant and was subject to the same pay
14 structure and rules as all the other hourly non-exempt employees of Defendant.

15 10. I am not aware of anything special about me that would raise unique defenses to my
16 claims, as opposed to the claims of the class. I am also not suing for anything unique to me. Rather, my
17 claims are based upon the same facts that relate to the rest of the Class.

18 11. I do not believe that I have any conflicts with Class Members included in this proposed
19 Settlement. I do not have any intention to take any action that would place me in a position that is hostile
20 to other Class Members.

21
22 SERVICE AS A CLASS REPRESENTATIVE

23 12. I believe that were it not for my stepping forward and taking on the duties of protecting
24 the interests of other Defendant employees, it is likely that the interests of the class would neither have
25 been prosecuted, nor benefited. To my knowledge, other than the litigation encompassed by this
26 proposed Settlement, there is no other litigation, on a class or individual basis, concerning the claims in
27 this lawsuit. Nor has Defendant pointed to any.

28 13. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to

1 search for information online these days, I will face an increased risk that future employers will
2 discover information about this lawsuit online and have a negative reaction to learning that I sued an
3 employer. This may make it harder for me to obtain future employment or change jobs for a better
4 opportunity.

5 14. I have devoted a substantial amount of my time, both before this lawsuit was filed and
6 also during its litigation to ensure a fair result for the employee class. This involved ongoing
7 communications and participation with my counsel during the course of this case.

8 15. My participation began with bringing certain issues that are involved in this matter to
9 my counsel's attention, and explaining the factual background that was used to prosecute the claims in
10 this case.

11 16. For example, I reviewed documents which I already had, I provided relevant documents
12 to my counsel, and I explained those documents and related facts to my counsel to assist them in their
13 review. I also assisted in identifying potential witnesses, including other employees, who might
14 likewise have been of assistance.

15 17. My efforts continued after suit was filed. For example, I continued to identify
16 employees and other witnesses to counsel, along with other information as to how they could be of
17 potential use in this matter. I also discussed strategy with my counsel.

18 18. I also made myself available to answer any questions that arose during the full day
19 mediation.

20 19. After the mediation, a long-form settlement agreement was negotiated, and I reviewed it
21 with my attorneys as well as I was able to ensure that its terms are likewise fair and adequate.

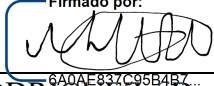
22 20. In sum, I believe I have provided well over 25 hours of my time during the course of
23 this litigation to ensure a good outcome for the best interests of the class.

24 21. I do not believe that I have any conflicts with Class Members included in this proposed
25 Settlement.

22. I have no relationship with the Administrator selected to administer this proposed Settlement.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on 1/27/2025, in California.

Firmado por:

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MAURA RODRIGUEZ, "Declarant"